## Remarks/Arguments:

Claims 1-10 and 12-17 are pending and stand rejected.

By this Amendment, claims 1-7, 15 and 17 are amended.

No new matter is added by the claim amendments. Support for the claim amendments can be found throughout the original specification and, for example, in the original specification at page 20, lines 1-9 and Fig. 2.

### Rejection of Claim 1 Under 35 U.S.C. § 112, Second Paragraph

In the Office Action, at item 6, claim 1 is rejected under 35 U.S.C. § 112, second paragraph.

Claim 1 has been amended from the phrase "all of communication links" to the phrase -- the plurality of communication links --. It is submitted that claim 1 is free from this rejection.

Reconsideration is respectfully requested.

### Rejection of Claims 1-10, 12 and 14-17 Under 35 U.S.C. § 102(e)

In the Office Action, at item 8, claims 1-10, 12 and 14-17 are rejected under 35 U.S.C. § 102(e) as anticipated by Takeda et al. (U.S. Patent No. 7,328,014, hereafter referred to as Takeda).

Reconsideration is respectfully requested.

#### Claim 1

Claim 1 is directed to a home link setting method at a time of activating or initializing a home gateway device having a home agent function for accommodating terminals including a first mobile terminal, the home gateway device being connected to a plurality of communication links, and recites:

> ... selecting, by the home gateway device, a home link
> from among the plurality of communication links other
> than a communication link which has received the
> network information; and
>
> executing, by the home gateway device, an internal
> setting so as to conduct the home agent function with
> respect to a mobile terminal on the home link.

That is, the home gateway device, at the time of activating or initializing, sets a home link. Further, the home gateway device: (1) selects a home link from among the plurality of communication links other than a communication link which has received the network information; and (2) executes an internal setting so as to conduct the home agent function with respect to a mobile terminal on the home link.

**Takeda Reference**

Takeda concerns a setting method occurring when a mobile node connects to an already established home link. More particularly, Takeda discloses a method for acquiring the home address when the mobile node (MN) has moved to a visited network other than the home link (or home network). In Takeda, the visited network 5 and the IP network 7 <u>are connected</u> by way of gateway equipment (or routers) <u>functioning as connection devices</u>. Takeda also discloses that gateway equipment 2 (2a, 2b) is <u>functioning as an interface between the visited network 5 and the IP network 7</u>. (See Takeda at column 6, lines 24-55.) Because Takeda discloses a method after the establishment of the home link, Takeda is silent regarding details of such a home link setting method. This is because, Takeda merely contemplates the ongoing functioning of the home link after initialization of the home link has finished.

Furthermore, Takeda, at the portion cited by the Examiner, namely: column 9, lines 1-4 and FIG. 9 at items 109-110 and 113, does not disclose or suggest "... at a time of activating or initializing ... selecting, by the home gateway device, a home link from among the plurality of communication links other than a communication link which has received the network information," as required by claim 1. This is because, Takeda merely sends setting information to the communication link connected to the mobile node via an already determined home link. That is, Takeda does not select a link among communication links as a home link on initialization of the home gateway equipment.

Moreover, Takeda is silent regarding "executing, by the home gateway device, an internal setting so as to conduct the home agent function with respect to a mobile terminal on the home link," as required by claim 1.   Instead, Takeda at step 113 discloses that gateway equipment 2 checks that certain option values in a received DHCP reply message are appropriate.   The gateway equipment 2 of Takeda then creates a new entry in the acceptable address list 340, and sends an authentication replay containing prefix information to MN3.   (See Takeda at column 8, line 65 to column 9, line 3.)   That is, Takeda concerns the sending of prefix information from the gateway equipment 2 to the mobile node MN3.   The prefix sending process of Takeda is not for setting (conducting) the home agent function.   More particularly, in Takeda, the gateway equipment 2 is on the foreign network 5 with the mobile node MN3 while home agent HA1 (which is the home agent of mobile node MN3) is connected to home network (home link) 6.   The prefix process of Takeda is executed on gateway equipment 2 in foreign network 5 and, in particular, is not executed on (processed by) the home agent HA1.   Thus, the prefix process of Takeda is not a process to internally set a home agent function because the home agent HA1 is not involved in the process.

Accordingly, claim 1 is submitted to patentably distinguish over Takeda for at least the above-mentioned reasons.

**Claims 6 and 17**

Claims 6 and 17, which include similar but not identical features to those of claim 1, are submitted to patentably distinguish over Takeda for at least similar reasons to those of claim 1.

**Claims 2-5, 7-10 and 15-16**

Claims 2-5, 7-10 and 15-16, which include all of the limitations of claim 1 or claim 6, are submitted to patentably distinguish over Takeda for at least similar reasons to those of their respective independent claims.

**Claim 12**

This rejection is respectfully traversed.

Claim 12 is directed to a mobile terminal, and recites:

> ... said mobile IP processing unit of the mobile terminal transmits the response message to a transmission source device which transmitted the verification message, said mobile IP processing unit further transmits another response message in which the state of its mobile router processing is written.

That is, another response message is sent from the mobile terminal and includes the state of its mobile router.

The Examiner appears to contend that the binding acknowledgement message disclosed in Takeda at column 15, lines 22-40, corresponds to the another message recited in claim 12. Applicants respectfully disagree. Takeda, at the portion cited by the Examiner, discloses that the binding acknowledgement message is sent to the mobile node MN3. This is reinforced in FIG. 9 of Takeda which shows that binding acknowledgement 121 is sent from home agent HA1 to mobile node MN3. By contrast, the present invention of claim 12 recites "the mobile terminal transmits the response message ... [and] further transmits another response message in which the state of its mobile router processing is written," (brackets and emphasis added), as required by claim 12.

Accordingly, claim 12 is submitted to patentably distinguish over Takeda for at least the above-mentioned reasons.

### Claim 14

Claim 14, which includes all of the limitations of claim 12, is submitted to patentably distinguish over Takeda for at least the same reasons as claim 12.

### Rejection of Claim 13 Under 35 U.S.C. § 103(a)

In the Office Action, at item 24, claim 13 is rejected under 35 U.S.C. § 103(a) as unpatentable over Takeda in view of Leung (U.S. Patent No. 6,466,964).

Reconsideration is respectfully requested.

Claim 13, which includes all of the limitations of claim 12, is submitted to patentably distinguish over Takeda for at least the same reasons as claim 12.

The addition of Leung does not overcome the deficiencies of Takeda. This is because, Leung does not disclose or suggest "... said mobile IP processing unit of the mobile terminal transmits the response message to a transmission source device which transmitted the verification message, said mobile IP processing unit further transmits another response message in which the state of its mobile router processing is written," as required by claim 12. Instead, Leung which is directed to a method for enabling a node that does not support mobile IP to roam from a first foreign agent to a second foreign agent, does not contemplate, for example, the another response message sent by the mobile terminal and, more particularly, that such a message includes the state of its mobile router processing. This is because the node of Leung functions without knowledge of the operation of the foreign agent or virtual agent scheme. (See Leung at Column 14, lines 47-49.) Thus, the node (mobile terminal) does not know the state of its mobile router processing in the another response message.

Accordingly, claim 13 is submitted to patentably distinguish over Takeda in view of Leung for at least for the above-mentioned reasons.
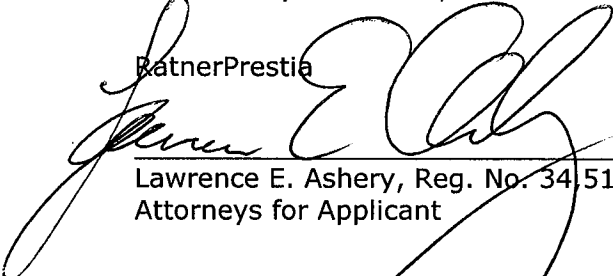
**Conclusion**

In view of the claim amendments and remarks, Applicant submits the application is in condition for allowance, which action is respectfully requested.

Respectfully submitted,

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